

U.S. Department of Justice



United States Attorney  
Southern District of New York  
Civil Division

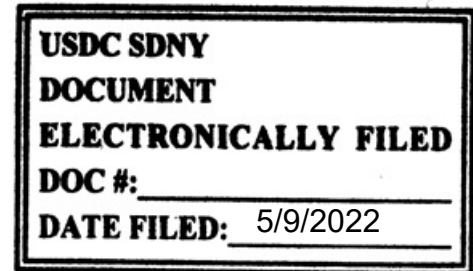
c/o Social Security Administration tel: (212) 264-2303  
Office of the General Counsel fax: (212) 264-6372  
26 Federal Plaza, Room 3904 Maria.Fragassi@ssa.gov  
New York, New York 10278

May 9, 2022

**BY CM/ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Arias v. Comm'r of Soc. Sec.*  
1:21-cv-03118-RWL



Dear Judge Lehrburger:

This Office represents Defendant in the above-referenced action. We write respectfully to request an additional second 30-day extension of time for Defendant to file her Cross-Motion for Judgment on the Pleadings and Response to Plaintiff's Motion for Judgment on the Pleadings, currently due on May 18, 2022, to June 17, 2022. The reason for the request is that the Regional Counsel's Office is currently experiencing very heavy workload constraints, and more time is needed to review the record and prepare the Commissioner's response. In addition, the Arias record is over 3,000 pages and the case contains complex issues. This 30-day extension of time will allow the undersigned to have sufficient time to review the record and respond to Plaintiff's motion. This is Defendant's second request for an extension of time to file her cross-motion in this case, and we apologize for any inconvenience to the Court. Plaintiff's counsel, Christopher Bowes, has graciously consented to the Defendant's extension request.

In the event that this motion is granted, Plaintiff's reply brief, which was originally due on May 27, 2022, will be due on June 27, 2022.

We thank this Court for its time and consideration.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

By: s/Maria Fragassi Santangelo  
MARIA FRAGASSI SANTANGELO  
Special Assistant United States Attorney  
c/o Social Security Administration  
26 Federal Plaza, Room 3904  
New York, New York 10278  
Telephone: 212.264.2303  
Fax: 212.264.6372  
E-mail: [Maria.Fragassi@ssa.gov](mailto:Maria.Fragassi@ssa.gov)

cc: Christopher Bowes, Esq.  
Via CM/ECF

Granted. No further extensions.

SO ORDERED:



5/9/2022

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE